ET 04-35

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From: aberkowitz@verizon.com [aberkowitz@verizon.com]
Sent: Fri 6/11/2004 5:16 PM
To: Whitey Thayer
Cc: Francis Hopwood; John Healy; Kent Nilsson
Subject: Re: 63.100/ARMIS meeting
Attachments:

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Whitey:

In response to your question asking us to explain the difference between the number of "assigned" numbers reported pursuant to 47 CFR 52.15(f) (approximately 190,000) and the number of access lines (27,787) reported in ARMIS for the NYCMNY50DS0 switch: As commenters in the Outage NPRM proceeding have explained, because there is different reporting criteria for 52.15(f) and ARMIS, the two reports measure different data. Section 52.15(f) reports rely on numbering resource records rather than switch data, and there are a variety of reasons why there may not be a close correlation between the number of "assigned telephone numbers" and the number of lines in use. See, e.g., SBC comments, at 4; ATIS Comments, at 13, 17-18. The data reported in the ARMIS 43-05 report, Table IV, by definition, only includes access lines that are line side connections; it does not include trunks-side connections serve! d by the switch. Therefore, telephone numbers that use trunk-side connections (such as PBX and Centrex DS0s), would not be included in the ARMIS report. Even for access lines that are reported in the ARMIS 43-05 report, there may be several telephone numbers assigned per access line. A single access line may have as many as three telephone numbers assigned to it. See ATIS Comments, at 17. In addition, because of the Commission's rules regarding the reporting of ported numbers, a portion of the assigned numbers on any given switch may not belong to the carrier experiencing an outage at that switch. See SBC Comments, at 4-5. Finally, the data on assigned numbers is reported twice a year, and may not be reported at the same time as ARMIS data.

Please let me know if you need any further information.

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05/13/2004 09:21 AM

To: Ann D. Berkowitz/EMPL/DC/Verizon@VZNotes
cc: "Kent Nilsson" <Kent.Nilsson@fcc.gov>, "John Healy" <John.Healy@fcc.gov>, "Francis Hopwood" <Francis.Hopwood@fcc.gov>
Subject: 63.100/ARMIS meeting

Ann:

Please express my personal thanks to all of the Verizon experts that attended the meeting yesterday afternoon. We greatly appreciate the time taken to address some of our questions. As a follow-up to that meeting I have a couple of clarifications:

1. During the meeting I referenced reports on telephone number utilization that Verizon (and all other carriers) provides to the FCC. The reports that I was referring to are provided in accordance with 47 CFR Section 52.15 (f) of our rules. When I used the term "working" telephone numbers I was referring to the "assigned numbers" as defined in subsection (1) (iii) of the above section.

2. With regards to the NYCMNY50DS0 switch, Verizon reported 191,947 assigned numbers as of June 30, 2003 and 189,098 assigned numbers as of December 31, 2003, dates that bracket the August 15, 2003 outage. It is also noted that the LERG shows 23 complete (10,000 numbers) central office codes working out of the NYCMNY50DS0 switch, or a possible 230,000 telephone numbers. In other words, switches around the country will route calls to any of the 230,000 telephone numbers to the NYCMNY50DS0 switch for completion.

With the additional information provided above, please help us to understand how the 27,787 access lines reported in ARMIS for the NYCMNY50DS0 switch handled incoming calls to, or outgoing calls from, the approximately 190,000 assigned numbers working in that switch at the time of the outage.

Since I do not have the email addresses for the other Verizon attendees at the meeting, please forward this email to them.

If you have any questions I can be reached on 202-418-0822.

Whitey Thayer
Senior Engineer